

I strongly believe that approval of ET 03-104 would violate the existing FCC rules on non-interference and would be contrary to the best interest of the public. I take this stand for three reasons:

- 1) As a user of the short wave spectrum (as an Amateur Radio operator) the generated noise levels, judging by testing done to date, will be unacceptably high
- 2) As an engineering professional, one who has for many years worked on issues such as EMI, both radiated and conducted over power lines, as a member of the NEMA US TAG to the US National Committee, on matters which come before the ISO, IEC and CENELEC. Why regulate emissions in one area (Industrial, Scientific and Medical Equipment) and allow much higher levels for BPL?
- 3) As a consumer, one recently affected by the blackout of 2003, who wishes the electric power industry would get back to their roots, and invest their technical capability and capital dollars in building and maintaining a reliable power grid, not delivering high speed Internet access.

Fundamentally, I wish for more research on the issue, before we simply go ahead and allow relaxed radiation limits. From the data I have seen, BPL has the potential to displace thousands of high frequency spectrum users (2-80 Mhz) by causing disruption to existing, licensed services.

Thank you.